

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

GREGOIRE TOURNANT,

Defendant.

22 Cr. 276 (LTS)

ORAL ARGUMENT REQUESTED

**SUPPLEMENTAL DECLARATION OF SETH L. LEVINE IN SUPPORT OF
DEFENDANT GREGOIRE TOURNANT'S MOTIONS**

Seth L. Levine, pursuant to 28 U.S.C. § 1746, states the following:

1. I am a partner of the law firm Levine Lee LLP, counsel for Gregoire Tournant in this action.

2. I submit this supplemental declaration in support of Mr. Tournant's (1) Motion to Dismiss the Indictment, or, in the Alternative, for a Hearing (ECF No. 53); and (2) Motion to Compel the Government to Produce *Brady* Material in the SEC's Files, or, in the Alternative, for a Hearing (ECF No. 45).

3. Attached hereto as **Exhibit A** is a true and correct copy of a plea agreement entered into by Allianz Global Investors U.S. LLC and the United States Attorney's Office for the Southern District of New York, dated May 17, 2022.

4. Attached hereto as **Exhibit B** is a true and correct copy of a Securities and Exchange Commission Notice of Application and Temporary Order, dated May 17, 2022.

5. Attached hereto as **Exhibit C** is a true and correct copy of an article published by Bloomberg entitled *Allianz to Sell US Fund Management Unit to Voya After SEC Ban*, dated May 17, 2022.

6. Attached hereto as **Exhibit D** is a true and correct copy of the New York City Bar Association Professional Ethics Committee's Formal Opinion 2004-02: Representing Corporations and Their Constituents in the Context of Governmental Investigations.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
March 15, 2023

By: /s/ Seth L. Levine
Seth L. Levine